

8.6 Public Health

8.6.1 Introduction

The City of Vernon (City) proposes to develop a power plant (VPP) on a 13.7-acre property at the southeast corner of Fruitland and Boyle avenues. The VPP will be a 914-megawatt (MW) net (at 65 degrees Fahrenheit [°F] with duct burners and evaporative cooling)/943-MW (gross) combined-cycle generating facility configured using three natural-gas-fired combustion turbines and one steam turbine. Two transmission line options are being considered to connect the plant to Southern California Edison's (SCE) Laguna Bell Substation. Natural gas for the facility will be delivered via approximately 2,300 feet of new 24-inch pipeline that will connect to Southern California Gas Company's (SoCalGas) existing gas transmission line (Line 765). Potable water for drinking, safety showers, fire protection, service water, and sanitary uses will be served from the City's potable water system through two 10-inch pipelines connecting to the City's water mains. One would connect in Boyle Avenue and the other one in Fruitland Avenue. Recycled water for industrial purposes will be provided by the Central Basin Municipal Water District (CBMWD) through a nominal 16-inch carbon steel (or if using high density polyethylene [HDPE], a 20-inch) water line connecting to its recycled water line in Boyle Avenue, adjacent to the plant site. The blowdown will be sent to Sanitation Districts of Los Angeles County (LACSD) via a new 2,400-foot section of City sanitary sewer line.

This subsection presents an assessment of risks to human health potentially associated with operation of the proposed facility, focusing on chemical substances¹ that may be emitted or released into the air. Air pollutants for which California Ambient Air Quality Standards (CAAQS) or National Ambient Air Quality Standards (NAAQS) have been established are addressed in Subsection 8.1, Air Quality.

The principal concerns for public health are associated with emissions of chemical substances into the air during routine operation of the proposed facility. Chemical substances in ambient air that potentially pose risks to human health include byproducts from the combustion of natural gas and diesel fuel from the emergency diesel fire pump and drift from the cooling tower due to the use of recycled water.

Substances with established CAAQS or NAAQS, including oxides of nitrogen (NO_x), carbon monoxide (CO), oxides of sulfur (SO_x) and particulate matter less than 10 microns in diameter (PM₁₀) are addressed in the Ambient Air Quality section (see Subsection 8.1.3) of this AFC. However, some discussion of the potential health risks associated with these substances is presented in this section. Human health risks potentially associated with accidental releases of used/stored hazardous materials at the proposed facility (aqueous ammonia) are also discussed in this subsection.

¹ In this section, the term *chemical substances* refers to chemical substances in ambient air that are regulated by either the United States Environmental Protection Agency (USEPA) and/or the State of California. The California Office of Environmental Health Hazard Assessment (OEHHA) and the California Air Resources Board (CARB) use the term Toxic Air Contaminant (TAC), which currently includes over 244 chemical substances. The USEPA uses the term Hazardous Air Pollutants (HAP), and has currently identified 188 substances as HAPs all of which are presently included in California's list of TACs.

8.6.2 Laws, Ordinances, Regulations, and Standards

An overview of the regulatory process for public health issues is presented in this section. The relevant laws, ordinances, regulations and standards that affect public health and are applicable to this project are identified in Table 8.6-1. Table 8.6-1 also summarizes the primary agencies responsible for public health, as well as the general category of the public health concern regulated by each of these agencies. The conformity of the project to each of the LORS applicable to public health is also presented in this table, as well as references to the locations where each of these issues is addressed. Points of contact with the primary agencies responsible for public health are identified in Table 8.6-2.

TABLE 8.6-1
Summary of Primary Regulatory Jurisdiction for Public Health

LORS	Public Health Concern	Primary Regulatory Agency	Project Conformance
U.S. Clean Air Act California Clean Air Act California Health and Safety Code Section 39666	Public exposure to air pollutants	USEPA Region IX California Air Resources Board (CARB) South Coast Air Quality Management District (SCAQMD)	Based on results of the human health risk assessment (HRA) as per OEHHA guidelines, toxic contaminants do not exceed acceptable levels (see Section 8.6.4.2). Emissions of criteria pollutants will be minimized by applying LAER/BACT to the facility. Increases in emissions of criteria pollutants will be fully offset (Section 8.6.5.1).
Health and Safety Code 25249.5 et seq. (Safe Drinking Water and Toxic Enforcement Act of 1986—Proposition 65)	Public exposure to chemicals known to cause cancer or reproductive toxicity	California Office of Environmental Health and Hazard Assessment (OEHHA)	Based on results of risk assessment as per California Air Pollution Control Officers Association (CAPCOA) guidelines, toxic contaminants do not exceed thresholds that require exposure warnings (see Section 8.6.4.2).
40 CFR Part 68 (Risk Management Plan)	Public exposure to regulated substances	USEPA Region IX City of Vernon, Environmental Health Department (EHD)	The facility will not be subject to 40 CFR Part 68 requirements because the quantities of regulated substances stored or handled will be below the threshold quantities.
Health and Safety Code Sections 25531 to 25541	Public exposure to regulated substances	Vernon EHD	A vulnerability analysis has been performed to assess potential risks from release of regulated substances (see Section 8.6.4.4).
Health and Safety Code Sections 44360 to 44366 (Air Toxics “Hot Spots” Information and Assessment Act—AB 2588)	Public exposure to toxic air contaminants from existing sources		Based on results of risk assessment as per OEHHA and ARB guidelines, toxic contaminants do not exceed acceptable levels.
SCAQMD Rule 402 Health and Safety Code Section 41700	Public exposure to toxic air contaminants	SCAQMD	Section 8.1.5.5.3 (Air Quality Consistency with Regulatory Requirements)
SCAQMD Rule 1401	Public exposure to toxic air contaminants	SCAQMD	The results of the HRA are below significance levels.

TABLE 8.6-1
Summary of Primary Regulatory Jurisdiction for Public Health

LORS	Public Health Concern	Primary Regulatory Agency	Project Conformance
SCAQMD Rule 1404	Prohibits the use of hexavalent chromium as a water treatment chemical in cooling towers	SCAQMD	No hexavalent chromium will be used by the project.

TABLE 8.6-2
Summary of Agency Contacts for Public Health

LORS	Public Health Concern	Primary Regulatory Agency	Regulatory Contact
U.S. Clean Air Act	Public exposure to air pollutants	USEPA Region IX	Gerardo Rios
California Clean Air Act		CARB	USEPA Region IX 75 Hawthorne Street San Francisco, CA 94105 (415) 947-3974
California Health and Safety Code Section 39666		SCAQMD	Michael Tollstrup Project Assessment Branch California Air Resources Board 2020 L Street Sacramento, CA 95814 (916) 322-6026
Health and Safety Code 25249.5 et seq. (Safe Drinking Water and Toxic Enforcement Act of 1986—Proposition 65)	Public exposure to chemicals known to cause cancer or reproductive toxicity	OEHHA	John Yee South Coast Air Quality Mgmt District 21865 Copley Drive Diamond Bar, CA 91765 (909) 396-2531
40 CFR Part 68 (Risk Management Plan)	Public exposure to acutely hazardous materials	USEPA Region IX	Cynthia Oshita or Susan Long Office of Environmental Health and Hazard Assessment 1001 I Street Sacramento, CA 916-445-6900
		Vernon Environmental Health Department (EHD)	Gerardo Rios Lewis Pozzebon Environmental Health Department 4305 Vernon Ave. Vernon, CA 90058 (323) 583-8811 ext. 229
Health and Safety Code Sections 25531 to 25541	Public exposure to acutely hazardous materials	Vernon EHD CARB SCAQMD	Lewis Pozzebon Michael Tollstrup John Yee

TABLE 8.6-2
Summary of Agency Contacts for Public Health

LORS	Public Health Concern	Primary Regulatory Agency	Regulatory Contact
Health and Safety Code Sections 44360 to 44366 (Air Toxics "Hot Spots" Information and Assessment Act—AB 2588)	Public exposure to toxic air contaminants from existing sources	CARB SCAQMD	Mike Tollstrup John Yee
SCAQMD Rule 402 Health and Safety Code Section 41700	Public exposure to toxic air contaminants	SCAQMD	John Yee
SCAQMD Rule 1401	Public exposure to toxic air contaminants	SCAQMD	John Yee
SCAQMD Rule 1404	Prohibits the use of hexavalent chromium as a water treatment chemical in cooling towers	SCAQMD	John Yee

8.6.3 Affected Environment

The City proposes to develop a power plant (Vernon Power Plant, or VPP). It will be 914-MW net combined-cycle generating facility configured using three natural-gas-fired combustion turbines and one steam turbine. The VPP will connect to the electrical transmission system via new double-circuit 230-kV line. Natural gas for the facility will be delivered via a new pipeline that will connect to SoCalGas existing gas transmission line.

Recycled water, for cooling tower makeup and other industrial uses, will be provided by CBMWD through a recycle water pipeline located in Boyle Avenue, adjacent to the site. Cooling water will be cycled in the cooling tower five times. The blowdown will be sent to LACSD via the City's sanitary sewer. Potable water for drinking, safety showers, fire protection, service water, and sanitary uses will be served from the City's potable water system. Sanitary wastewater disposal will be sent to LACSD via the City's sanitary sewer system. A new sewer line connection will be added to connect to the County's system.

The site is located southeast of the intersection of Fruitland and Boyle avenues on a 13.7-acre parcel. Access to the site will be from Fruitland Avenue. There are no sensitive receptors (such as schools, daycare facilities, convalescent centers, or hospitals) in the immediate vicinity of the project site. The nearest sensitive receptor is a senior high school located approximately 0.75 mile south, southwest of the project site. There are a few residences in the vicinity of the site. Appendix 8.6A contains the location, name, and coordinates for the sensitive receptors within a 6-mile radius of the project site. A map of the sensitive receptors from that appendix is provided in Figure 8.6-1. Figure 8.6-2a to 2d provides a map of churches and parks within 3 miles of the project site. Further description of sensitive receptors within a 6-mile radius of the project site is presented in Hazardous Materials, Subsection 8.12. A figure showing all terrain areas exceeding the elevation of the stack, within a 10-mile radius of the project is provided in Figure 8.6-3.

The terrain within a 10-mile radius of the project is provided under separate cover on 7.5-minute U.S. Geological Survey (USGS) Quad maps, five sets of which have been submitted to the California Energy Commission (CEC). Figure 8.6-4 provides an index of the 7.5-minute Quad maps within the project vicinity.

Appendix 8.6B contains a listing of the publicly available health studies in the project area.

8.6.4 Environmental Analysis

Potential environmental impacts associated with the project that are addressed in this section are limited to human exposure to chemical substances of concern emitted into the air. The human health risks potentially associated with these substances were evaluated in a health risk assessment. Table 8.6-3 presents the chemical substances potentially emitted to the air from the proposed facility. No air toxics are expected to be emitted from the oil/water separator or emergency fire pump fuel tank.

TABLE 8.6-3
Chemical Substances Potentially Emitted to the Air from VPP

Criteria Pollutants	Noncriteria Pollutants (Continued)
Carbon monoxide	Polycyclic aromatic hydrocarbons (PAHs)
Oxides of nitrogen	Benzo(a)anthracene
Particulate matter	Benzo(a)pyrene
	Benzo(b)fluoranthene
	Benzo(k)fluoranthene
	Chrysene
	Dibenz(a,h)anthracene
	Indeno(1,2,3-cd)pyrene
Noncriteria Pollutants (Toxic Pollutants)	Naphthalene
Ammonia	Arsenic
Acetaldehyde	Antimony
Acrolein	Barium
1,3-Butadiene	Beryllium
Benzene	Cadmium
Chlorobenzene	Chromium
Diesel Exhaust Particulate Matter	Cyanide
Ethylbenzene	Copper
Formaldehyde	Lead
Hexane	Manganese
Hydrogen chloride	Mercury
Propylene	Nickel
Propylene oxide	Selenium
Toluene	Silver
Xylene	Thallium
	Zinc

8.6.4.1 California Environmental Quality Act Significance Criteria for Health Impacts

SCAQMD CEQA guidelines define significance thresholds for cancer health impacts as equal to or greater than 10×10^{-6} (10 in a million) for the Maximum Exposed Individual (MEI) cancer risk. The SCAQMD guidelines also define significance thresholds for the non-cancer health effects as a project-wide MEI hazard index equal to or greater than 1.

8.6.4.2 Criteria Air Pollutants

Emissions of criteria pollutants will adhere to NAAQS or CAAQS as discussed in the Air Quality section (see Subsection 8.1). The proposed facility also will include emission control technologies necessary to meet the required emission standards specified for criteria pollutants under South Coast Air Quality Management District (SCAQMD) rules. Offsets will be required for emissions of criteria pollutants that exceed specified thresholds, to assure that the project will not result in an increase in total emissions in the vicinity. Additionally, air dispersion modeling results (presented in the Air Quality section, Subsection 8.1) show that emissions will not result in concentrations of criteria pollutants in air that exceed ambient air quality standards (either NAAQS or CAAQS) for those pollutants for which the area is designated as attainment. These standards are intended to protect the general public with a wide margin of safety. Therefore, the project is not anticipated to have a significant impact on public health from emissions of criteria pollutants.

8.6.4.3 Chemical Substances of Potential Concern in Ambient Air

For the purposes of determining the potential maximum ambient concentrations of chemical substances that may be emitted, VPP chemical substance emissions were modeled with the combustion turbines operated at base load at an ambient temperature of 65°F. Duct burner fuel usage was incorporated into the chemical substance emission estimates assuming 8,760 hours of turbine operations and 5,000 hours of duct burner operations per year. The emission estimates also assumed the cooling tower was operated at the maximum recirculation rate for 8,760 hours per year and that the fire pump was operated at its maximum rate for 200 hours² per year. These operating conditions represent the maximum emissions profile (being permitted) for the VPP.

Potential impacts associated with emissions of chemical substances of potential concern into the air from the proposed facility were addressed in a health risk assessment, presented in Appendix 8.6C. The risk assessment was prepared using guidelines developed under the South Coast Air Quality Management District's July 2005 *Risk Assessments Procedures for Rules 1401 and 212 Version 7*. For detailed risk assessment, such as the assessment prepared in this evaluation, these Procedures include the *SCAQMD July 2005 Supplemental Guidelines for Preparing Risk Assessments for the Air Toxics "Hot Spots" Information and Assessment Act (AB2588)*. Those guidelines supplement the *Air Toxics Hotspots Program Guidance Manual for Preparation of Health Risk Assessments* (OEHHA 2003) and the CARB (California Air Resources Board) Recommended Interim Risk Management Policy for Inhalation-based Residential Cancer Risk (CARB 2003). The chemical substances of concern that were addressed in the assessment are listed in Table 8.6-4, along with their respective published OEHHA health effect values.

² The emergency diesel fire pump is expected to operate up to 50 hours per year for testing and maintenance. However, in order to analyze the worst-case public health impacts from the Project, it was assumed that the emergency diesel fire pump was operated at the maximum annual hours per year.

TABLE 8.6-4
Risk Assessment Health Values for Substances of Potential Concern

Compound	Cancer Risk		Non-cancer Effects	
	Inhalation Cancer Potency (mg/kg-day)	Oral Slope Factor ($\mu\text{g}/\text{m}^3)^{-1}$	Chronic Inhalation Reference Exposure Level ($\mu\text{g}/\text{m}^3$)	Acute Inhalation Reference Exposure Level ($\mu\text{g}/\text{m}^3$)
Acetaldehyde	1.0 E-2	-	9.0E+00	--
Acrolein	--	--	6.0 E-02	1.9E-01
Ammonia	--	--	2.0E+02	3.2E+03
Antimony	--	--	2.0E-01	--
Arsenic*	1.2E+01	1.5 E+00	3.0E-02	1.9E-01
Benzene	1.0E-01		6.0E+01	1.3E+03
Beryllium*	8.4E+00		7.0E-03	
1,3-Butadiene	6.0E-01		2.0E+01	--
Cadmium*	1.5E+01		2.0E-02	--
Chromium VI*	5.1E+02		2.0E-1	--
Chlorobenzene	--	--	1.0E+03	--
Copper	--	--	2.4E+00	1.0E+02
Ethylbenzene	--	--	2.0E+03	--
Diesel exhaust particulate matter	1.1E+00	--	5.0 E+00	--
Formaldehyde	2.1E-02		3.0E+00	9.4E+01
Hexane	--	--	7.0E+03	--
Hydrochloric acid	--	--	9.0E+00	2.1E+03
Lead	4.2E-02	8.5E-03	--	--
Manganese	--	--	9.0E-01	--
Mercury*	--	--	9.0E-02	1.8E+00
Naphthalene	1.2E-01	--	9.0E+00	--
Nickel	9.1E-01		5.0E-02	6.0E+00
PAHs	3.9E+00	1.2E+01	--	--
Propylene	--	--	3.0E+03	--
Propylene oxide	1.3E-02		3.0E+01	3.1E+03
Selenium	--	--	2.0E+01	--
Toluene	--	--	3.0E+02	3.7E+04
Xylene	--	--	7.0E+02	2.2E+04
Zinc	--	--	3.5E+01	--

Source: OEHHA/ARB, 2005

* These compounds are also listed, and were evaluated, for oral non-cancer health effects

Emissions of substances of potential concern that may be associated with the proposed facility (gas-fired turbines and emergency diesel fire pump) were estimated using emission factors approved by the South Coast Air Quality Management District. Cooling tower emissions of substances of potential concern were estimated based on a mass balance technique using the water supply quality, cooling tower maximum cycles of concentration, water recirculation rate, and mist eliminator drift rate. No emissions from the oil/water separators and emergency diesel fire pump fuel tank were included because a review of the Material Safety Data Sheets indicated no substances of potential concern would be present in lubricating oil and diesel fuel. Detailed calculations in support of these emissions are shown in Appendix 8.1

Concentrations of these substances in ambient air associated with the potential emissions were estimated using the SCAQMD-approved HARP software package. The HARP software includes the USEPA's ISCST3 dispersion model, which estimates both short-term and long-term average ambient concentrations, at receptor locations, for use in a risk assessment. ISCST3 accounts for site-specific terrain, meteorological conditions, and emissions parameters (such as stack exit velocities and temperatures) in order to estimate ambient concentrations. Health risks potentially associated with the estimated concentrations of chemical substances in ambient air were characterized in terms of excess lifetime cancer risks (for substances listed by OEHHA as cancer causing), or comparison with reference exposure levels for non-cancer health effects (for substances listed by OEHHA with non-cancer causing effects).

The term Maximum Exposed Individual (MEI)³ is taken from OEHHA risk assessment guidelines (OEHHA, 2003) and refers to an individual resident (MEIR) or worker (MEIW) that is located at the point where the highest ambient concentrations of modeled chemical substances associated with facility emissions are predicted. Cancer risk and non-cancer health hazard were estimated for both the MEIR and the MEIW based on the modeled ambient concentrations of substances of potential concern.

Receptor locations were evaluated to be residential or industrial, based on aerial photographs of the vicinity surrounding the facility. OEHHA risk assessment guidelines (OEHHA 2003) also require that, cancer risk and non-cancer health hazard values at each sensitive receptor (such as schools, hospitals, day-care centers) located within the zone of impact be estimated, where the zone of impact included the region surrounding the facility modeled to show a potential maximum added lifetime cancer risk (all pathways 70-year exposure) of one in one million or greater. For non-carcinogens, the zone of impact is defined as bounding the area surrounding the facility modeled to show a potential hazard index of greater than or equal to one half. The analysis in Appendix 8.6C shows the area with a modeled residential (70-year exposure) potential maximum added lifetime cancer risk of greater than one in a million extends no more than 150 feet past the property line and does not include any potential sensitive or residential receptors. There is no modeled hazard index of greater than 0.5; therefore, there is no zone of impact for non-cancer effects.

³ The terms MEI, MEIR, and MEIW refer to a receptor location of maximum ambient exposure and do not incorporate a reference to cancer risk or to non-cancer acute or chronic exposures. In the South Coast Air Quality Management District, Rules 1401 and 1402 refer to Maximum Individual Cancer Risk (MICR) which, by OEHHA terminology would be termed the MEI for Cancer effects.

The evaluation of potential non-cancer health effects from exposure to short-term and long-term concentrations in air was performed by comparing modeled concentrations at the MEIR and MEIW with reference exposure levels (RELs). An REL is a concentration in ambient air at or below which no adverse health effects are anticipated. Potential non-cancer effects were evaluated by calculating a ratio of the modeled concentration in air and the REL. This ratio is the hazard quotient. The inhalation cancer potency and oral slope factor values and RELs used to characterize health risks associated with modeled concentrations in air were obtained from the *Consolidated Table of Office of Environmental Health and Hazard Assessment (OEHHA)/ Air Resources Board (ARB) Approved Risk Assessment Health Values*.

This health risk assessment included potential health impacts from inhalation, skin contact, and oral pathways as required by OEHHA guidelines. Additionally, this assessment included highly-conservative assumptions such as a 70-year exposure duration for residential receptors and a 40-year exposure duration for commercial/industrial receptors. Additional conservative assumptions included extremely high exposure rates such as the 95th percentile breathing rate of 393 liters of air/kg-day were included.

8.6.4.3.1 Potential Health Risks Associated with Chemical Substances in Ambient Air

The MEIR potential maximum excess life time cancer risk was estimated to be 0.568 in a million, and the MEIW lifetime cancer risk was estimated to be 0.493 in a million. Excess lifetime cancer risks less than 10×10^{-6} (10 in a million) are unlikely to represent public health impacts that require additional air pollution control applied to facility emissions.

For residential receptors, benzene and formaldehyde emissions from the turbines and chromium from the cooling towers have the highest potential to contribute to the excess cancer risk, but the contribution from each pollutant is less than 0.2 in a million. The dominant exposure pathways for benzene, formaldehyde and chromium are through inhalation.

The maximum hazard index for acute non-carcinogenic substances is 0.0544. The hazard index for chronic non-carcinogenic substances is 0.0222 for the residential MEI and also 0.0222 for the commercial/industrial MEI.

HARP modeling results are presented in Appendix 8.6C.

8.6.4.4 Hazardous Materials

Hazardous materials will be used and stored at the facility. The quantities of hazardous materials proposed to be stored onsite and a description of their uses are presented in Subsection 8.12. Use of hazardous materials at the proposed facility will be in accordance with standard practices for storage and management of hazardous materials. Normal use of hazardous materials, therefore, will not pose significant impacts to public health. While mitigation measures will be in place to prevent releases, accidental releases that could migrate offsite, resulting in potential impacts to the public.

The California Health and Safety Code Sections 25531 to 25541 and Code of Federal Regulations (CFR) Title 40 Part 68 under the Clean Air Act establish emergency response planning requirements for some of the hazardous materials. The hazardous materials regulated under these regulations are termed as regulated substances. These regulations require preparation of a Risk Management Plan (RMP), which is a comprehensive program to

identify hazards and predict the areas that may be affected by a release of a regulated substance. The only regulated substances to be used at the facility above California regulatory thresholds is aqueous ammonia as discussed in Subsection 8.12. This regulated substance may generate hazardous gases that could migrate offsite when released.

A vulnerability analysis was performed to assess potential risks to humans at various distances from the site if a release of ammonia were to occur. The results of the vulnerability analysis showed that the offsite concentrations at the VPP fenceline would not exceed either the California Energy Commission's stringent 75-parts-per-million (ppm) ammonia significance level. Therefore, no public health impacts are expected from the storage and use of regulated substances at the VPP (see Subsection 8.12, Hazardous Materials Handling).

8.6.4.5 Operation Odors

Small amounts of ammonia used to control oxides of nitrogen (NO_x) emissions may escape up the exhaust stack but would not produce operational odors. The expected exhaust gas ammonia concentration, known as ammonia "slip," will be less than 5 ppm. After mixing with the atmosphere, the concentration at ground level will be far below the detectable odor threshold of 5 ppm that the Compressed Gas Association has determined to be acceptable. Therefore, potential ammonia emissions are not expected to create objectionable odors.

8.6.5 Cumulative Impacts

In October 1997, the MATES-II study was initiated as part of the Environmental Justice Initiatives adopted by the SCAQMD Governing Board. It consisted of a comprehensive monitoring program, an updated emissions inventory, and a modeling effort to characterize health risks associated with human exposures to ambient concentrations of Toxic Air Contaminants (TACs) in the Southern California Air Basin (SCAB). The monitoring network consisted of 10 fixed sites and three mobile platforms that sampled at 14 additional communities. Over 30 TACs were measured, including both gases and particulate matter.

The results of the MATES-II study estimated that the excess lifetime carcinogenic risk from exposures to airborne TACs in the SCAB averages about 1,400 in a million (1.4×10^{-3}), meaning that an individual exposed over a 70-year lifetime would have about a 0.14 percent additional chance of contracting cancer. The estimated carcinogenic risk was found to be rather uniform across the Basin. For example, the risk ranged from about 1,120 in a million to about 1,740 in a million for the 10 fixed monitoring sites.

The MATES-II study showed that mobile sources (e.g., cars, trucks, trains, ships, and aircraft) represent the greatest contributors to the estimated risks. About 70 percent of all carcinogenic risk is attributed to diesel particulate matter (DPM) emissions; about 20 percent is attributed to other toxics associated with mobile sources (including benzene, butadiene, and formaldehyde); about 10 percent of all risk is attributed to emissions from stationary sources (which include industries and other businesses, such as dry cleaners and chrome plating operations.)

The SCAQMD has established a project significance threshold for maximum incremental lifetime cancer risk of 10 in a million. Background levels of TACs in SCAB result in risks that greatly exceed this significance threshold and state and federal programs are underway to identify and control the sources contributing to TAC emissions and associated risks.

In 1998, the California Office of Environmental Health Hazard Assessment (OEHHA) listed diesel particulate matter (DPM), a primary combustion product from diesel engines, as a TAC. New standards have been adopted by CARB and the United States Environmental Protection Agency (USEPA) to reduce DPM emissions from new on-road heavy duty vehicles. USEPA estimates that, when fully implemented, the new program will result in PM emission levels, and the corresponding health impacts that are 95 percent below today's levels, (USEPA 2000). Further, the current California Air Resources Board (CARB) emissions inventory shows DPM emission levels will decrease in Los Angeles County by 22 percent below today's levels by 2010.

The MEIR potential maximum excess life time cancer risk for the proposed project have been estimated to be 0.568 in a million, and the MEIW lifetime cancer risk was estimated to be 0.493 in a million. Both are substantially below the significance threshold of 10 in a million. The risks are even lower at more distant locations. Given the conservatism in the estimate, the actual risks would likely be much smaller. The maximum hazard index for acute non-carcinogenic substances is 0.0544, which is well below the significance level of 1.0 at the location of maximum impact.

Federal and state diesel motor vehicle emission reduction programs are in place and projected to create significant reductions in DPM emissions, and corresponding health impacts, in the region, and current SCAQMD health-based regulations ensure that new sources of air pollutants are not introduced that will create significant health impacts. Combined, these factors will ensure that the project's potential net health impact would not be cumulatively considerable.

8.6.6 Mitigation Measures

8.6.6.1 Criteria Pollutants

Emissions of criteria pollutants will be minimized by applying Best Available Control Technology (BACT) to the emission sources, which will include the use of only natural gas in the combustion turbines.

The proposed project location is in an area that is designated by the state as nonattainment for ozone, carbon monoxide⁴, and particulate matter (PM). Therefore, all increases in emissions of NO_x, volatile organic compounds (VOC), carbon monoxide, particulate matter with an aerodynamic diameter less than a nominal 10 micrometers (PM₁₀), and sulfur oxides (SO_x) must be fully offset if emissions exceed specified trigger limits. The combination of using BACT and providing emission offsets will result in no net increase in criteria pollutants. Therefore, further mitigation of emissions is not required to protect public health.

8.6.6.2 Chemical Substances of Potential Concern in Ambient Air

Emissions of chemical substances of potential concern to the air will be minimized through the use of natural gas as the only fuel at the proposed facility. As demonstrated in the health risk analysis, no significant public health impact is expected. Therefore, no mitigation is proposed.

⁴ A request for redesignation from non attainment to attainment was issued by the SCAQMD in July 2005.

8.6.6.3 Hazardous Materials

Mitigation measures for hazardous materials are presented below and discussed in more detail in Subsection 8.12. Potential public health impacts from the use of hazardous materials are only expected to occur as a result of an accidental release. The plant has many safety features designed to prevent and minimize impacts from the use and accidental release of hazardous materials. The VPP will include the following design features:

- Curbs, berms, and/or concrete pits will be provided where accidental release of chemicals may occur.
- A fire protection system will be included to detect, alarm, and suppress a fire, in accordance with the applicable LORS.
- Construction of the aqueous ammonia storage system will be in accordance with applicable LORS.

An RMP for the facility will be prepared prior to commencement of facility operations. The RMP will estimate the risk presented by handling ammonia at the facility. The RMP will include a hazard analysis, offsite consequence analysis, seismic assessment, emergency response plan, and training procedures. The RMP process will accurately identify and propose adequate mitigation measures to reduce the risk to the lowest possible level.

A safety program will be implemented and will include safety training programs for contractors and operations personnel, including instructions on: (1) the proper use of personal protective equipment, (2) safety operating procedures, (3) fire safety, and (4) emergency response actions. The safety program will also include programs on safely operating and maintaining systems that use hazardous materials. Emergency procedures for VPP personnel will include power plant evacuation, hazardous material spill cleanup, fire prevention, and emergency response.

Areas subject to potential leaks of hazardous materials will be paved and bermed. Incompatible materials will be stored in separate containment areas. Containment areas will be drained to either an oily waste collection sump or to the wastewater neutralization tank. Also, piping and tanks exposed to potential traffic hazards will be additionally protected by traffic barriers.

8.6.7 References

CARB. 2003. Recommended Interim Risk Management Policy for Inhalation-Based Residential Cancer Risk.

Hutt, P.B. 1985. "Use of Quantitative Risk Assessment in Regulatory Decision-making Under Federal Health and Safety Statutes," in *Risk Quantitation and Regulatory Policy*. D.G. Hoel, R.A. Merrill and F.P. Perera, Eds. Banbury Report 19, Cold Springs Harbor Laboratory.

OEHHA. 2003. Air Toxics Hotspots Program Guidance Manual for Preparation of Health Risk Assessments.

SCAQMD, 2000. Multiple Air Toxics Emissions Study (MATES-II). December.

SCAQMD. 2005. Supplement Guidelines for Preparing Risk Assessments for the Air Toxics "Hot Spots" Information and Assessment Act (AB2588). July.

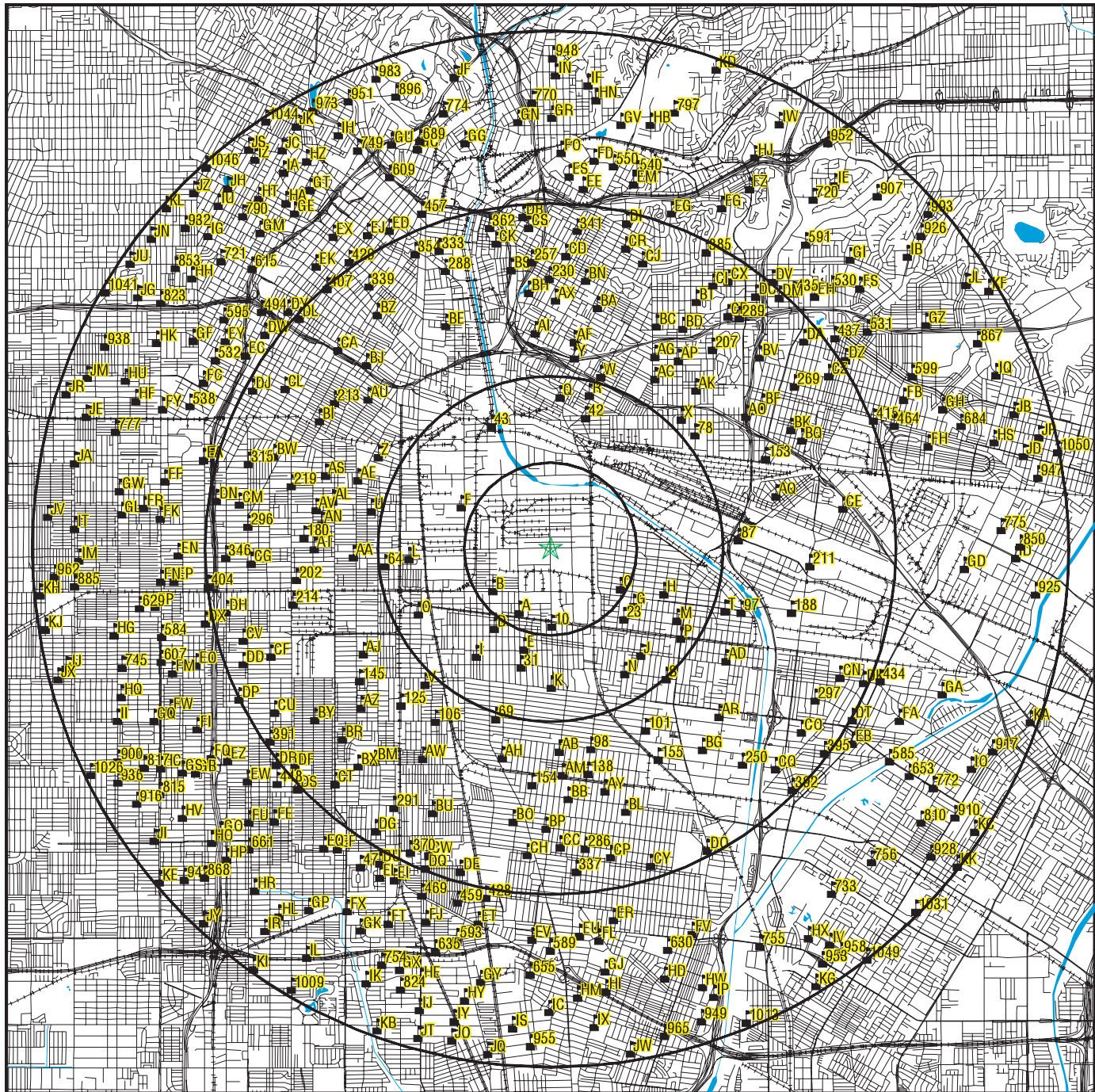
SCAQMD. 2005. Risk Assessment Procedures for Rules 1401 and 212, Version 7.0 SCAQMD July.

Travis, C.C., E.A.C. Crouch, R. Wilson and E.D. Klema. 1987. "Cancer Risk Management: A Review of 132 Federal Regulatory Cases." *Environ. Sci. Technol.* 21: 415-420.

USEPA. 2005. Guidelines for Carcinogen Risk Assessment. Office of Health and Environmental Assessment. EPA/600/P-92/003C. March.

USEPA, 2000. Regulatory Impact Analysis: Heavy Duty Engine and Vehicle Standards and Highway Diesel Fuel Sulfur Control Requirements, EPA420-R-00-026. December.

RECEPTOR MAP - 1498213.1s

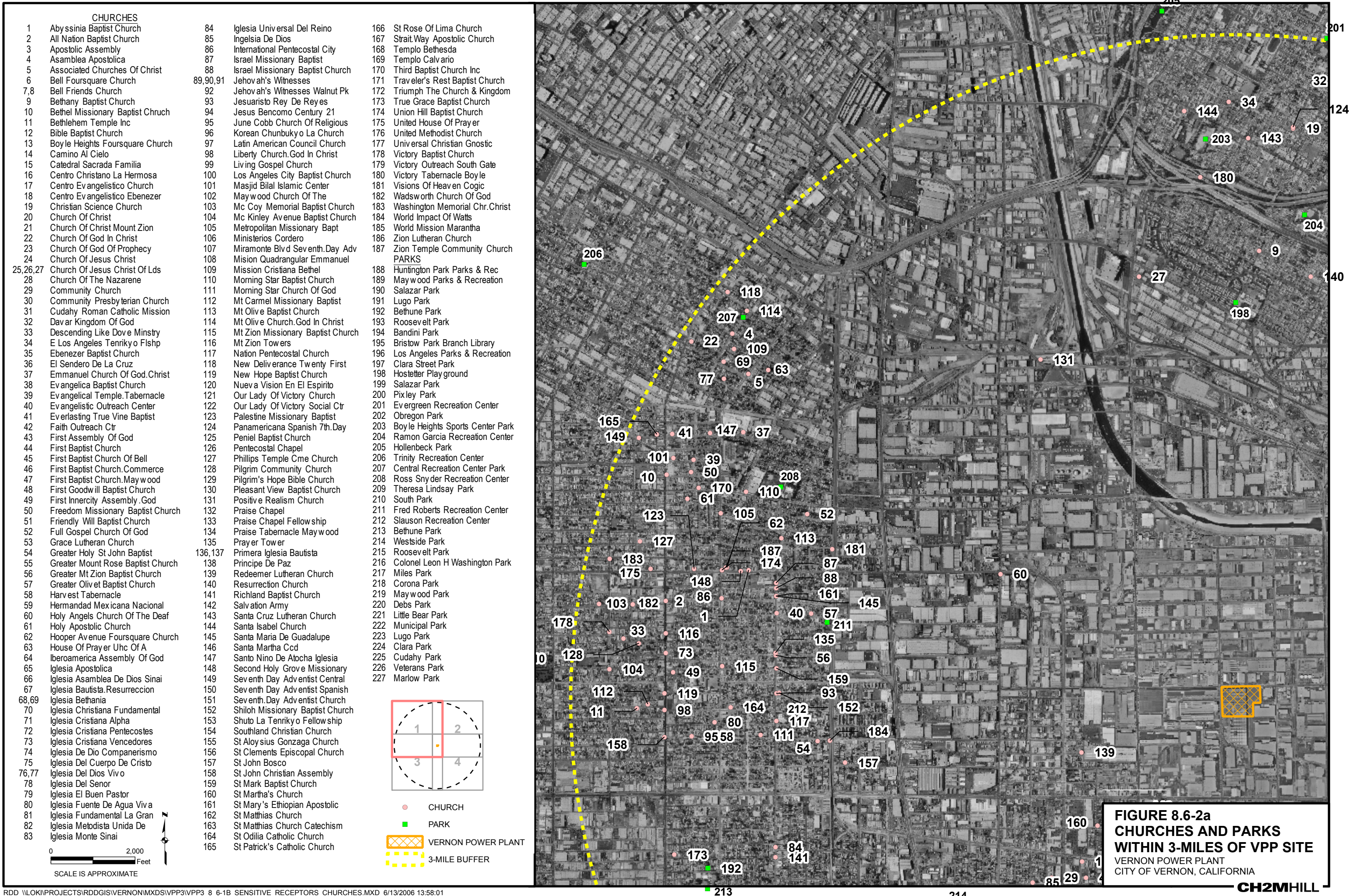


- ★ Target Property
- ⚡ Roads
- ⚡ Waterways
- 🏠 Environmental or Public Receptor
- 🌿 Federal Lands Linear Features
- 🔥 Federal Lands Area

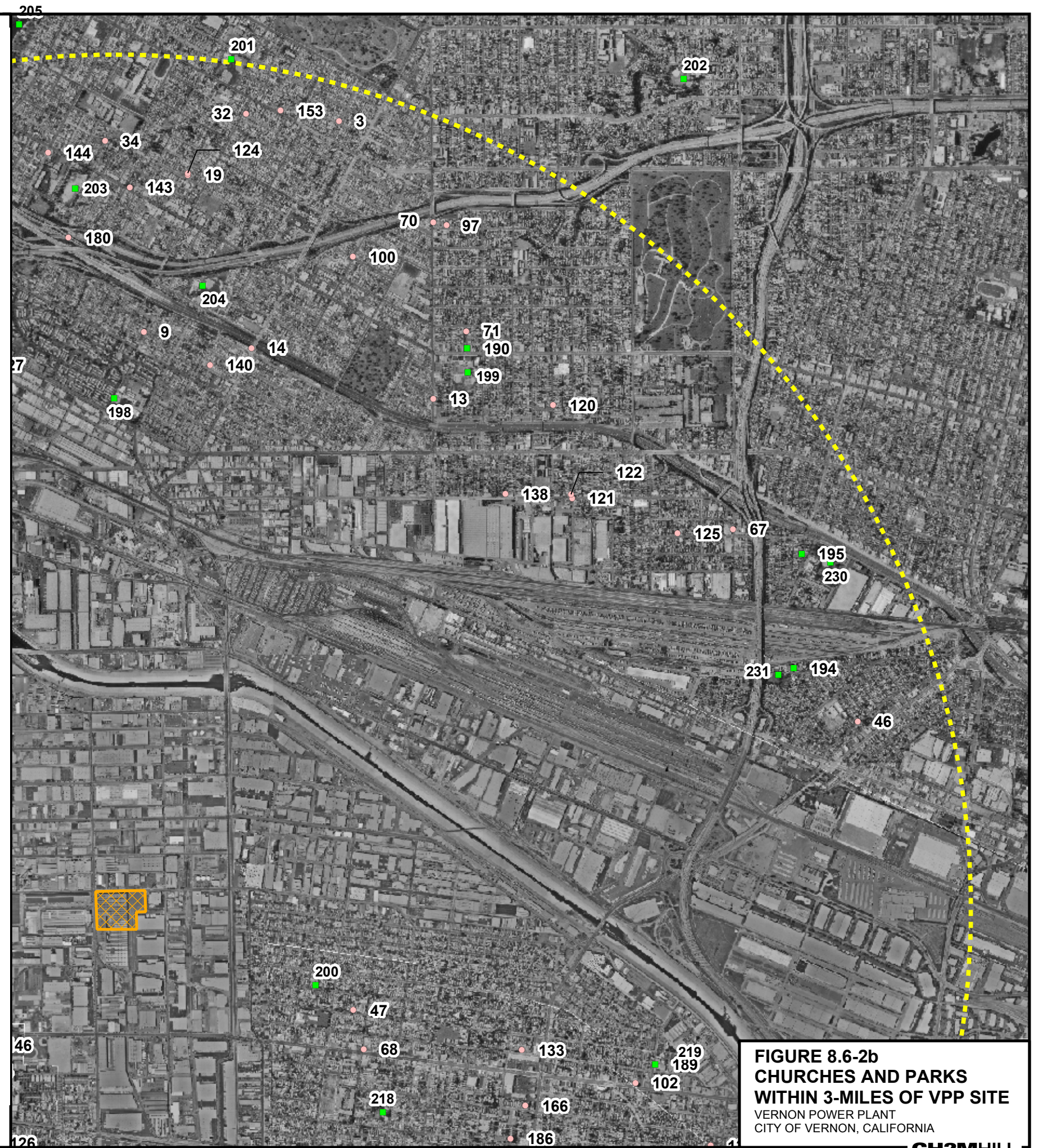
A horizontal number line is shown with tick marks at 0, 1 1/2, 3, and 6 Miles. A red dot is placed on the line between 1 1/2 and 3, closer to 1 1/2.

SOURCE: ENVIRONMENTAL DATA RESOURCES, 2005

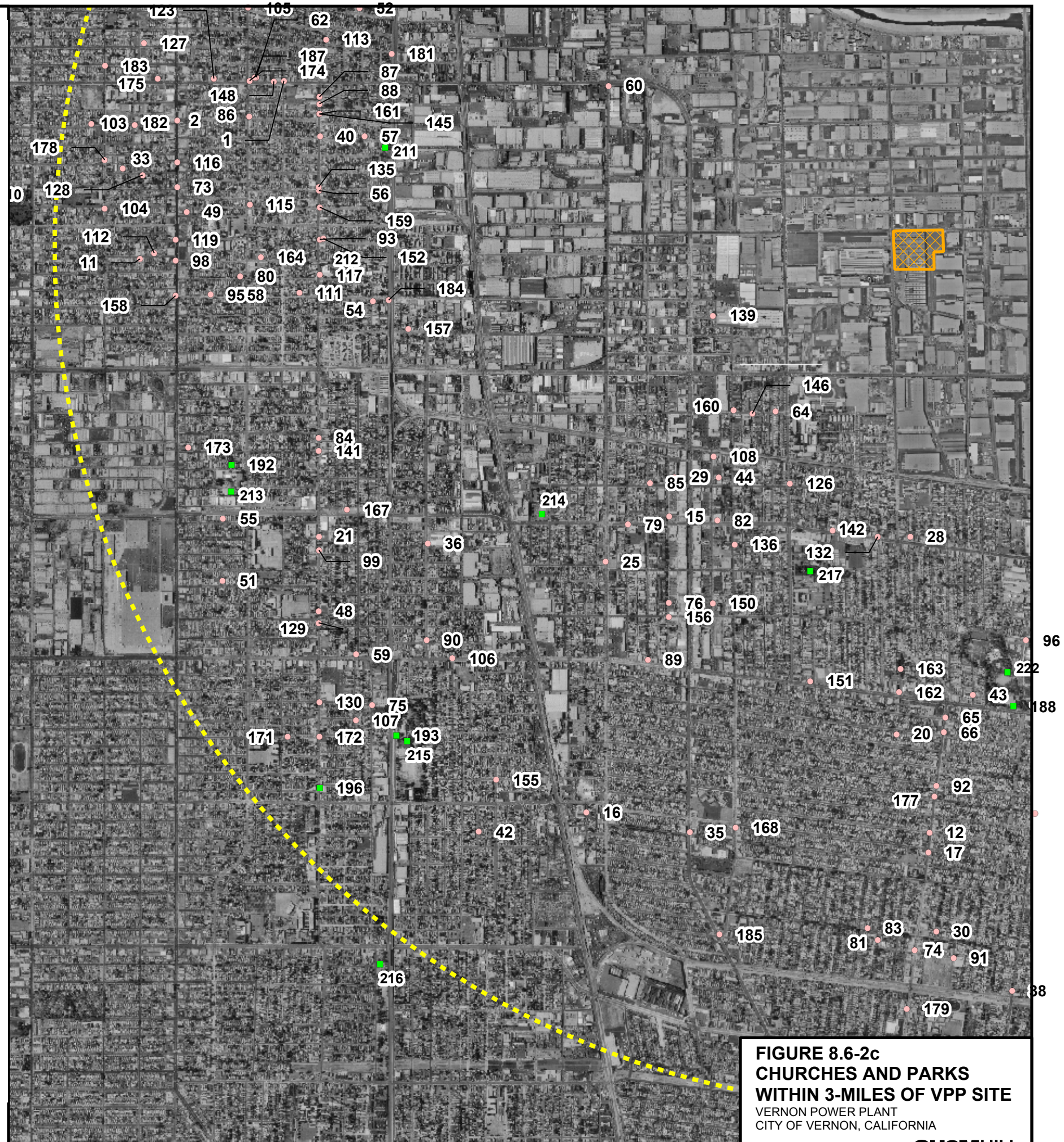
FIGURE 8.6-1
SENSITIVE RECEPTORS
WITHIN 6 MILES OF VPP SITE
VERNON POWER PLANT
CITY OF VERNON, CALIFORNIA
CH2MHILL

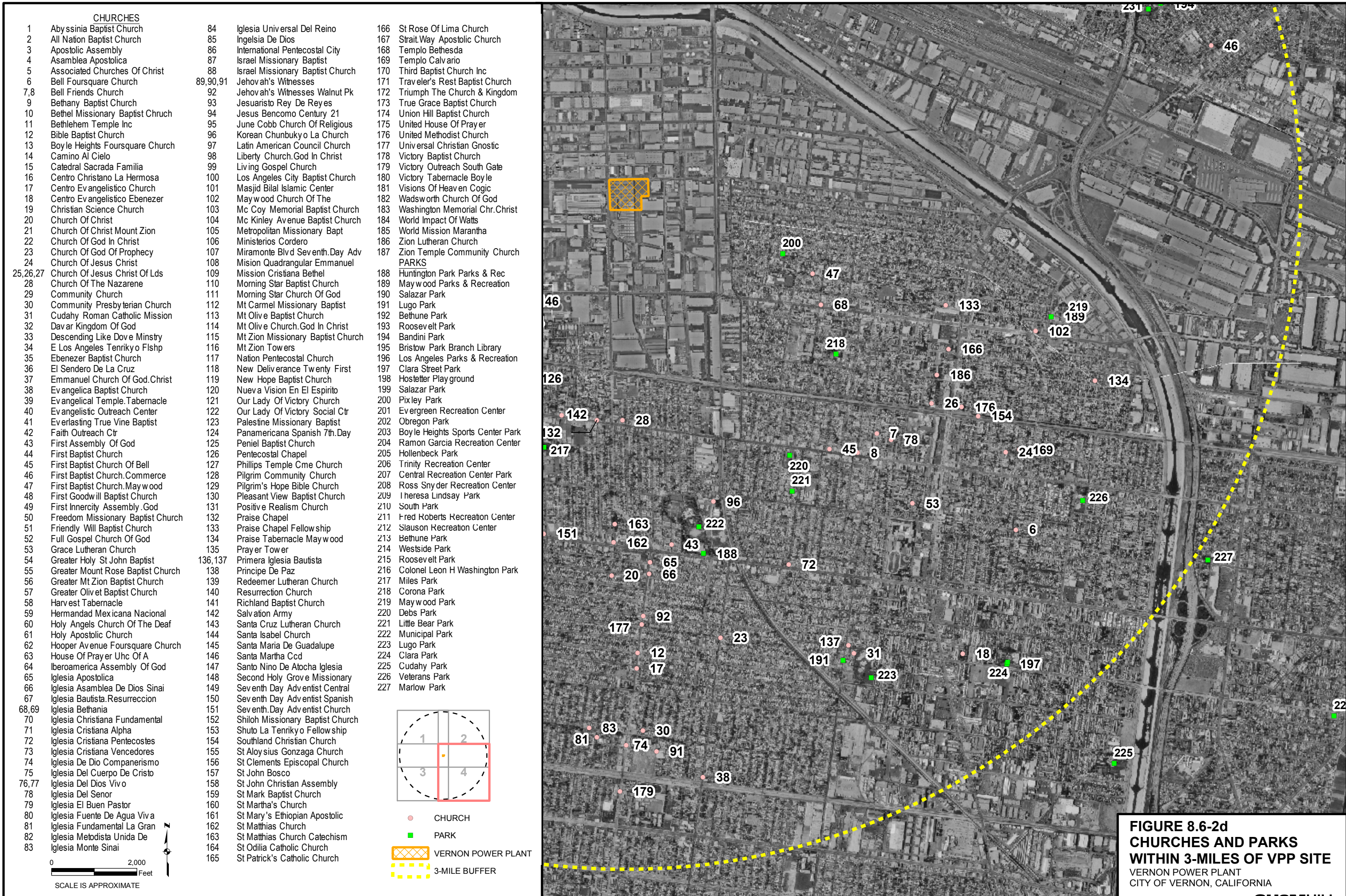


1	Abyssinia Baptist Church	84	Iglesia Universal Del Reino	166	St Rose Of Lima Church
2	All Nation Baptist Church	85	Ingelsia De Dios	167	Strait Way Apostolic Church
3	Apostolic Assembly	86	International Pentecostal City	168	Templo Bethesda
4	Asamblea Apostolica	87	Israel Missionary Baptist	169	Templo Calvario
5	Associated Churches Of Christ	88	Israel Missionary Baptist Church	170	Third Baptist Church Inc
6	Bell Foursquare Church	89,90,91	Jehovah's Witnesses	171	Traveler's Rest Baptist Church
7,8	Bell Friends Church	92	Jehovah's Witnesses Walnut Pk	172	Triumph The Church & Kingdom
9	Bethany Baptist Church	93	Jesuaristo Rey De Reyes	173	True Grace Baptist Church
10	Bethel Missionary Baptist Church	94	Jesus Bencomo Century 21	174	Union Hill Baptist Church
11	Bethlehem Temple Inc	95	June Cobb Church Of Religious	175	United House Of Prayer
12	Bible Baptist Church	96	Korean Chunbukyo La Church	176	United Methodist Church
13	Boyle Heights Foursquare Church	97	Latin American Council Church	177	Universal Christian Gnostic
14	Camino Al Cielo	98	Liberty Church.God In Christ	178	Victory Baptist Church
15	Catedral Sacrada Familia	99	Living Gospel Church	179	Victory Outreach South Gate
16	Centro Christano La Hermosa	100	Los Angeles City Baptist Church	180	Victory Tabernacle Boyle
17	Centro Evangelistico Church	101	Masjid Bilal Islamic Center	181	Visions Of Heaven Cogic
18	Centro Evangelistico Ebenezer	102	Maywood Church Of The	182	Wadsworth Church Of God
19	Christian Science Church	103	Mc Coy Memorial Baptist Church	183	Washington Memorial Chr.Christ
20	Church Of Christ	104	Mc Kinley Avenue Baptist Church	184	World Impact Of Watts
21	Church Of Christ Mount Zion	105	Metropolitan Missionary Bapt	185	World Mission Marantha
22	Church Of God In Christ	106	Ministerios Cordero	186	Zion Lutheran Church
23	Church Of God Of Prophecy	107	Miramonte Blvd Seventh.Day Adv	187	Zion Temple Community Church
24	Church Of Jesus Christ	108	Mision Quadrangular Emmanuel		PARKS
25,26,27	Church Of Jesus Christ Of Lds	109	Mission Cristiana Bethel	188	Huntington Park Parks & Rec
28	Church Of The Nazarene	110	Morning Star Baptist Church	189	Maywood Parks & Recreation
29	Community Church	111	Morning Star Church Of God	190	Salazar Park
30	Community Presbyterian Church	112	Mt Carmel Missionary Baptist	191	Lugo Park
31	Cudahy Roman Catholic Mission	113	Mt Olive Baptist Church	192	Bethune Park
32	Davar Kingdom Of God	114	Mt Olive Church.God In Christ	193	Roosevelt Park
33	Descending Like Dove Minstry	115	Mt Zion Missionary Baptist Church	194	Bandini Park
34	E Los Angeles Tenrikyo Flshp	116	Mt Zion Towers	195	Bristow Park Branch Library
35	Ebenezer Baptist Church	117	Nation Pentecostal Church	196	Los Angeles Parks & Recreation
36	El Sendero De La Cruz	118	New Deliverance Twenty First	197	Clara Street Park
37	Emmanuel Church Of God.Christ	119	New Hope Baptist Church	198	Hostetter Playground
38	Evangelica Baptist Church	120	Nueva Vision En El Espirito	199	Salazar Park
39	Evangelical Temple.Tabernacle	121	Our Lady Of Victory Church	200	Pixley Park
40	Evangelistic Outreach Center	122	Our Lady Of Victory Social Ctr	201	Evergreen Recreation Center
41	Everlasting True Vine Baptist	123	Palestine Missionary Baptist	202	Obregon Park
42	Faith Outreach Ctr	124	Panamericana Spanish 7th.Day	203	Boyle Heights Sports Center Park
43	First Assembly Of God	125	Peniel Baptist Church	204	Ramon Garcia Recreation Center
44	First Baptist Church	126	Pentecostal Chapel	205	Hollenbeck Park
45	First Baptist Church Of Bell	127	Phillips Temple Cme Church	206	Trinity Recreation Center
46	First Baptist Church.Commerce	128	Pilgrim Community Church	207	Central Recreation Center Park
47	First Baptist Church.Maywood	129	Pilgrim's Hope Bible Church	208	Ross Snyder Recreation Center
48	First Goodwill Baptist Church	130	Pleasant View Baptist Church	209	Theresa Lindsay Park
49	First Inncity Assembly .God	131	Positive Realism Church	210	South Park
50	Freedom Missionary Baptist Church	132	Praise Chapel	211	Fred Roberts Recreation Center
51	Friendly Will Baptist Church	133	Praise Chapel Fellowship	212	Slauson Recreation Center
52	Full Gospel Church Of God	134	Praise Tabernacle Maywood	213	Bethune Park
53	Grace Lutheran Church	135	Prayer Tower	214	Westside Park
54	Greater Holy St John Baptist	136,137	Primera Iglesia Bautista	215	Roosevelt Park
55	Greater Mount Rose Baptist Church	138	Principe De Paz	216	Colonel Leon H Washington Park
56	Greater Mt Zion Baptist Church	139	Redeemer Lutheran Church	217	Miles Park
57	Greater Olivet Baptist Church	140	Resurrection Church	218	Corona Park
58	Harvest Tabernacle	141	Richland Baptist Church	219	Maywood Park
59	Hermanad Mexicana Nacional	142	Salvation Army	220	Debs Park
60	Holy Angels Church Of The Deaf	143	Santa Cruz Lutheran Church	221	Little Bear Park
61	Holy Apostolic Church	144	Santa Isabel Church	222	Municipal Park
62	Hooper Avenue Foursquare Church	145	Santa Maria De Guadalupe	223	Lugo Park
63	House Of Prayer Uhc Of A	146	Santa Martha Ccd	224	Clara Park
64	Iberoamerica Assembly Of God	147	Santo Nino De Atocha Iglesia	225	Cudahy Park
65	Iglesia Apostolica	148	Second Holy Grov'e Missionary	226	Veterans Park
66	Iglesia Asamblea De Dios Sinai	149	Seventh Day Adventist Central	227	Marlow Park
67	Iglesia Bautista.Resurreccion	150	Seventh Day Adventist Spanish		
68,69	Iglesia Bethania	151	Seventh.Day Adventist Church		
70	Iglesia Cristiana Fundamental	152	Shiloh Missionary Baptist Church		
71	Iglesia Cristiana Alpha	153	Shuto La Tenrikyo Fellowship		
72	Iglesia Cristiana Pentecostes	154	Southland Christian Church		
73	Iglesia Cristiana Vencedores	155	St Aloysius Gonzaga Church		
74	Iglesia De Dio Companerismo	156	St Clements Episcopal Church		
75	Iglesia Del Cuerpo De Cristo	157	St John Bosco		
76,77	Iglesia Del Dios Vivo	158	St John Christian Assembly		



Address	City	State	Zip	Phone	Website	Notes
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